

PLAINTIFFS' EXHIBIT 3
AFFIDAVIT OF LINDA G. SMITH



IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

BRENDA GREEN, et al.
Plaintiffs

vs.

MANAGEMENT & TRAINING
CORPORATION, et al.
Defendants

Civil Action No. 3:17-cv-149-MPM-JMV

AFFIDAVIT OF LINDA G. SMITH

STATE OF MISSISSIPPI
COUNTY OF PANOLA

PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the State and County aforesaid, the within named Linda G. Smith, who after being duly sworn states under oath as follows:

1. I, Linda G. Smith, am an adult resident citizen of Sardis, Mississippi. I am over twenty-one years of age, of sound mind and body, and provide this Affidavit based on my personal knowledge of the facts stated herein.

2. I am the sister of John R. Green, III, deceased.

3. On January 4, 2017 inmates from MCCF began calling me at around 10:30 a.m. telling me that my brother, John R. Green, III, was calling for help on January 1, beginning about 3:00 a.m., but no prison personnel were responding.

4. I wrote down the incoming telephone numbers and one name. The name was Kevin Wilson. I believe he called on (504) 295-3532. Other calls were received from (720) 385-5772; (270) 303-2645; and (612) 444-0550. At least two callers agreed that John played dominoes until midnight and then went to bed. At about 3:00 a.m. he awoke with chest pain. The inmates started making a lot of noise, but no one came until after 6:00 a.m. The inmates said the guards found him on the floor and put him on the stretcher. I later learned that he died at 7:41 a.m.

Linda Green Smith
LINDA G. GREEN

SWORN AND SUBSCRIBED BEFORE ME, This, the 26 day of February, 2018.

2/26/2018 *Melissa Meek Phelps*
NOTARY PUBLIC

My Commission expires 1-1-2020

(SEAL)



By: *Daphne Smith, D.C.*